

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 22-11666
David Alderfer	:	Chapter 13
	:	Judge Ashely M. Chan
Debtor(s)	:	* * * * *
	:	
David Alderfer	:	Date and Time of Hearing
Kenneth E. West	:	<hr/>
	:	
vs	:	Related Document No. 36
	:	
KeyBank N.A. as servicer for Freddie	:	
Mac	:	
Respondents.	:	

**OBJECTION OF KEYBANK N.A. AS SERVICER FOR FREDDIE MAC TO THE
CONFIRMATION OF THE AMENDED PLAN (DOCKET NUMBER 36)**

KeyBank N.A. as servicer for Freddie Mac ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed amended plan ("Plan") filed by David Alderfer ("Debtor") as follows:

1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 240 Morwood Road, Lower Salford Township, Harleysville, PA 19438-0000 ("Property").
2. Creditor has filed a Proof of Claim in the amount of \$179,181.59. This amount includes a pre-petition arrearage in the amount of \$73,363.52.
3. Debtor's Plan does not provide for the arrearage due on Creditor's claim. Instead, the Plan states that the arrearage was paid pre-confirmation by Debtor and by PAHAF Grant. Creditor objects and states there is a prepetition arrearage still due of more than \$43,000.00 and a post-petition arrearage of more than \$2,200.00.

4. At this time, Creditor has not offered a permanent loan modification agreement to Debtor.
5. Debtor's Plan represents an impermissible modification of Creditor's claim and a violation of 11 U.S.C. §§1322 and 1325.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Amended Plan.

Respectfully submitted,

/s/ Adam B. Hall

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Attorneys for Creditor
The case attorney for this file is Adam B. Hall.
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Movant, :
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Mac :
Respondents. :

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of KeyBank N.A. as servicer for Freddie Mac to the Confirmation of the Amended Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Robert Edward Angst, Attorney for David Alderfer, RobertAngst@Angstlaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

David Alderfer, 240 Morwood Road, Harleysville, PA 19438

/s/ Adam B. Hall